UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
FILED

MAR 05 2024

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISIONNATHAN OCHSNER
CLERK OF COURT

UNITED STATES OF AMERICA

vs

DAVID GOMEZ-RAMOS
GREGORIO SALINAS
FRANCISCO JAVIER ALANIS MARTINEZ
GERARDO ALANIS MARTINEZ§
§
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§

CRIMINAL NO. B-21-184-S4

**SEALED SUPERSEDING
INDICTMENT**

THE GRAND JURY CHARGES:

COUNT ONE

From on or about January of 2020, to March of 2022, in the Southern District of Texas and elsewhere and within the jurisdiction of the Court, Defendants,

**DAVID GOMEZ-RAMOS,
GREGORIO SALINAS,
FRANCISCO JAVIER ALANIS MARTINEZ, and
GERARDO ALANIS MARTINEZ**

did knowingly and intentionally conspire and agree with persons known and unknown to the Grand Jurors to knowingly and intentionally possess with intent to distribute a quantity more than five (5) kilograms of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

COUNT TWO

On or about June 13, 2020, in the Southern District of Texas and within the jurisdiction of the Court, Defendants,

**DAVID GOMEZ-RAMOS,
GREGORIO SALINAS,
FRANCISCO JAVIER ALANIS MARTINEZ, and
GERARDO ALANIS MARTINEZ,**

did knowingly and intentionally possess with intent to distribute a quantity more than five (5) kilograms, that is, approximately 26.36 kilograms of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THREE

On or about August 8, 2020, in the Southern District of Texas and within the jurisdiction of the Court, Defendants,

**DAVID GOMEZ-RAMOS,
GREGORIO SALINAS,
FRANCISCO JAVIER ALANIS MARTINEZ, and
GERARDO ALANIS MARTINEZ**

did knowingly and intentionally possess with intent to distribute a quantity more than five (5) kilograms, that is, approximately 13.62 kilograms of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FOUR

On or about April 12, 2021, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

DAVID GOMEZ-RAMOS,

did knowingly and intentionally possess with intent to distribute a quantity more than five (5) kilograms, that is, approximately 22 kilograms of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

NOTICE OF CRIMINAL FORFEITURE
[Title 21, United States Code, Section 853]

Pursuant to Title 21, United States Code, Section 853, the United States gives notice to defendants, that upon conviction of an offense in violation of Title 21, United States Code, Section 841 and/or Section 846, the defendants,

**DAVID GOMEZ-RAMOS,
GREGORIO SALINAS,
FRANCISCO JAVIER ALANIS MARTINEZ, and
GERARDO ALANIS MARTINEZ,**

shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense. The property to be forfeited includes, but is not limited to, the following:

NOTICE OF CRIMINAL FORFEITURE
[Title 18, United States Code, Section 982(a)(1)]

Pursuant to Title 18, United States Code, Section 982(a)(1), the United States gives notice to the defendants, that in the event of conviction of an offense in violation of Title 18, United States Code, Section 1956, all property, real or personal, involved in the offense, or traceable to such property, is subject to forfeiture.

PROPERTY SUBJECT TO FORFEITURE

Defendant is notified that the property subject to forfeiture includes, but is not limited to, the following:

The real property, including all improvements and appurtenances, located at 10608 La Siesta, La Feria, Texas 78559.

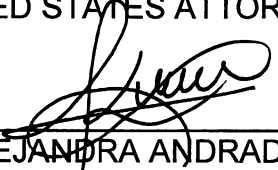
MONEY JUDGMENT; SUBSTITUTE ASSETS

The United States may seek the imposition of a money judgment. In the event that a condition listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the defendant in substitution up to the total value of the property subject to forfeiture.

A TRUE BILL:

FOREPERSON OF THE GRAND JURY

ALAMDAR S. HAMDANI
UNITED STATES ATTORNEY



K. ALEJANDRA ANDRADE
Assistant United States Attorney